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REDACTED - FOR PUBLIC INSPECTION

November 19, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Applications of GCI Communication Corp., ACS Wireless License Sub, Inc.,

ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to the

Assignment of Licenses to Alaska Wireless Network, LLC

WT Docket No. 12-187

Dear Ms. Dortch:

On behalf of ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (collectively "ACS"), the enclosed materials are responsive to certain of the October 11, 2012 request for information and clarification in the above-referenced proceeding (the "October 11 Letter"). 1

The enclosed hard drive responds to document request number 12. In accordance with the October 11 Letter, the hard drive, which includes Summation load files, is identified as submitted by ACS, the production volume is sequentially numbered ACSFCC-001 to follow previous volumes of documents submitted, and the individual images are sequentially numbered ACS_FCC0000000001 through ACS_FCC00000000046 to follow previous submissions of images.

Document request number 12 states:

Letter from Ruth Milkman, Chief, Wireless Telecommunications Bureau, to Lisa Phillips, ACS Wireless, Oct. 11, 2012.

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12. Provide any cost models the Company or any third party has constructed to evaluate changes to Universal Service Funding.

ACS Response:

ACS has previously provided cost modeling information to the Commission for its evaluation of Connect American Fund ("CAF") Phase I incremental support and CAF Phase II support in the Commission's Connect America Fund dockets WC Nos. 10-90 and 05-337. These filings are submitted here in response to the Commission's request for cost models that the company has constructed to evaluate changes to Universal Service Funding.

In response to the Commission's request for data to be used in determining eligibility for and amounts of CAF Phase I incremental support, ACS submitted data on three different occasions. ACS encloses here the two Highly Confidential filings it made on February 29, 2012 and March 30, 2012,² as well as the filing it made on March 9, 2012.³

In response to the Commission's request for cost models for determining CAF Phase II support, ACS submitted a Highly Confidential cost model on February

See Letter from Karen Brinkmann, counsel for Alaska Communications Systems, to Marlene H. Dortch, Secretary, FCC (filed Feb. 29, 2012) regarding Wireline Competition Bureau Seeks Comment on Potential Data for Connect America Fund Phase One Incremental Support, DCC Public Notice in WC Dockets 10-90 and 05-337, DA 12-137 (Wireline Competition Bur., rel. Feb. 6, 2011) ("CAF I Wire Center Public Notice"); Second Protective Order in WC Docket Nos. 10-90 and 05-337, DA 12-192 (Wireline Competition Bur., rel. Feb. 10, 2012); see also Letter from Karen Brinkmann, counsel for Alaska Communications Systems, to Marlene H. Dortch, Secretary, FCC (filed March 30, 2012) regarding Wireline Competition Bureau Seeks Comment on Potential Data for Connect America Fund Phase One Incremental Support, DCC Public Notice in WC Dockets 10-90 and 05-337, DA 12-137 (Wireline Competition Bur., rel. Feb. 6, 2011) ("CAF I Wire Center Public Notice"); Second Protective Order in WC Docket Nos. 10-90 and 05-337, DA 12-192 (Wireline Competition Bur., rel. Feb. 10, 2012).

See Letter from Karen Brinkmann, counsel for Alaska Communications Systems, to Marlene H. Dortch, Secretary, FCC (filed March 9, 2012) regarding Wireline Competition Bureau Seeks Comment on Potential Data for Connect America Fund Phase One Incremental Support, DCC Public Notice in WC Dockets 10-90 and 05-337, DA 12-137 (Wireline Competition Bur., rel. Feb. 6, 2011) ("March 9 Filing").

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13, 2012,⁴ and supplemental Highly Confidential information on February 29, 2012.

The documents provided in this submission are Highly Confidential to ACS, with the exception of the March 9 Filing, and the Highly Confidential documents are being provided under seal pursuant to the Commission's Second Protective Order in this docket. All materials included in the enclosed hard drive, except the March 9 Filing, that are responsive to document request number 12 are designated as "Highly Confidential" with the Highly Confidential information individually redacted. The hard drive is marked, "HIGHLY CONFIDENTIAL – SUBJECT TO SECOND PROTECTIVE ORDER IN WT DOCKET NO. 12-187 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION," according to the requirements of the Second Protective Order. The redacted materials already are available to the public via the Commission's Electronic Comment Filing System.

ACS has made diligent efforts to ensure that none of the documents it is submitting here is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ACS requests that any privileged documents inadvertently produced be returned to ACS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

Please contact me should any questions arise concerning this filing.

Respectfully submitted,

/s/
Karen Brinkmann
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cc: Kathy Harris, Wireless Telecommunications Bureau

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See Letter from Karen Brinkmann, counsel for Alaska Communications Systems, to Marlene H. Dortch, Secretary, FCC (filed Feb. 13, 2012) regarding *Request for Connect America Fund Cost Models*, FCC Public Notice in WC Dockets 10-90 and 05-337, DA 11-2026 (Wireline Competition Bur., rel. Dec. 15, 2011) – Submitted Pursuant to *Second Protective Order* in WC Docket Nos. 10-90 and 05-337, DA 12-192 (Wireline Competition Bur., rel Feb. 10, 2010).